

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x Docket No.: 07 CIV 3363

LISA-ATHENA S. ABU HANTASH, in
Her individual capacity and as mother and natural
Guardian of JORDAN-ANNETTEE JAZZMIN
RICHARDSON, a minor, and JORDAN
RICHARDSON, INC., a Virginia Corporation,

Plaintiffs,

-against-

V. MODEL MANAGEMENT NEW YORK, LLC
And VNY MODEL MANAGEMENT, LLC

AFFIRMATION IN OPPOSITION
TO PLAINTIFFS' MOTION
TO STRIKE PORTIONS OF
DEFENDANTS' ANSWER AND
AFFIRMATIVE DEFENSE


Defendants,

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WILMER HILL GRIER, an attorney duly licensed to practice law in all of the courts of
New York State and duly admitted to practice law in all in the United States Court ,
Southern District affirms under the penalty of perjury as follows:

1. I am the attorney for the defendants, V. Model Management New York, Inc., (the
correct name of this corporation is V Models, Inc., and VNY Model Management, LLC.
2. I am making this affirmation in opposition to the Plaintiffs' motion to strike portions
of the Defendants' answer with regard to this matter.
3. In this case the defendants herein in answer to paragraphs 22, 34, 35, 36, 65, 66,
67, 73, 75, 77, 79, 89, 98, 99, 109, 110, 111 and 134 of the plaintiffs' complaint stated in
defendants' answer facts that the defendants had actual knowledge of in their answers to
the plaintiffs' allegations contained in paragraphs 22, 34, 35, 36, 65, 66, 67, 73, 75, 77,
79, 89, 98, 99, 109, 110, 111 and 134.
4. In this case each of the defendants' answers to the allegations contained in
paragraphs 22, 34, 35, 36, 65, 67, 73, 75, 77, 79, 89, 98, 99, 109, 110, 111, and 134 have
a direct bearing on the out come of this case.

Wherefore, it is respectfully requested that the court deny the plaintiffs' motion to strike in
its entirety together with such other, further and different relief as to the Court seems just,
equitable and proper under the circumstances.

AFFIRMED:
June 11, 2007


Wilmer Hill Grier
Wilmer Hill Grier (WG4187)